

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

A.O.A, et al.,)
)
Plaintiffs,)
)
vs.) Case No. 4:11-CV-44-CDP
) (CONSOLIDATED)
DOE RUN RESOURCES)
CORPORATION, et al.,)
)
Defendants.)

JOINT STATUS REPORT

Pursuant to Case Management Order 12 (Doc. 372), the parties submit the following report for the Court's consideration.

A. Ongoing Discovery

The parties are continuing to work to comply with previously-set discovery deadlines and are working together to address any discovery issues. The parties agree that there are no issues that currently require resolution by the Court.

By way of update, during the week of the conference with the Court on March 24, 2016, Defendants intend to produce their outstanding privilege logs and any corresponding non-privileged and redacted documents that were subject to privilege review. As the Court is aware, Defendants have been working with their ESI vendor (Precision Discovery) in a managed contract attorney review process to finalize the privilege logs and produce any non-privileged or partially privileged documents that were identified as potentially privileged by the parties' agreed-upon third-party ESI vendor (H5). Because of the volume and complexity of the underlying ESI data, this process has taken considerably longer than expected. However, Defendants have been keeping Plaintiffs up to date on their progress over the last number of

weeks and the parties have agreed on the timeline for production of these privilege logs and documents.

By way of further update, Defendant The Doe Run Resources Corporation completed its production of non-privileged and redacted documents subject to privilege review on March 8, 2016, and expects to produce its final ESI privilege log during the week of the March 24th conference. Defendant Doe Run Resources' hard copy and ESI document productions are now complete and consists of: 5,020 hard copy documents (totaling 103,779 pages), 124,865 ESI documents (individually TIFF imaged and totaling 528,131 pages), and 55,147 ESI documents produced in their native format.

Defendant The Renco Group, Inc. expects to product its final ESI privilege log and complete its production of non-privileged and redacted documents subject to privilege review during the week of the March 24th conference. To date, Defendant The Renco Group, Inc. has produced 7,701 hard copy documents totaling 152,697 pages. Renco Group has also completed production of 18,070 ESI documents (individually TIFF imaged for a total of 83,066 pages) and an additional 6,101 ESI documents that were produced in their native format, for a total of 24,171 ESI documents. Renco Group has also produced a total of over 3,327,000 ESI documents from the Doe Run Peru data, nearly all of which were able to be produced in their native format.

The parties are prepared to update the Court as to each party's respective progress on other discovery matters, to the extent the Court requests additional information.

B. Dismissal of Certain Plaintiffs

The parties have met and conferred regarding six (6) plaintiffs selected by Defendants for the initial discovery cohort, which six plaintiffs have not responded to the interrogatories or

document requests propounded by Defendants, in accordance with the deadlines set forth in the Court's Case Management Order No. 11 (Doc. 331) and Amended Case Management Order No. 11 (Doc. 331). Defendants plan to file a motion to dismiss these plaintiffs' cases.

Dated: March 17, 2015

Respectfully submitted,

**SCHLICHTER, BOGARD & DENTON,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17th day of March, 2016, the foregoing was filed via the ECF/CM system with the Clerk of the Court and served upon counsel of record via email through the Court's ECF/CM system by means of the Notice of Electronic Filing.

/s/ Elizabeth M. Wilkins
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